IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 2:05-cr-270-LSC
)	
ANGELA MICHELLE WILLIAMS)	

MOTION OF COUNSEL FOR LEAVE TO WITHDRAW

The undersigned J. Fairley McDonald, III, and the law firm of Slaten & O'Connor, P.C., respectfully move for leave to withdraw as counsel for Angela Michelle Williams in the above-captioned cause, it being shown:

- 1. Effective April 17, the undersigned is assuming a legal position with an agency of the State of Alabama and, in that capacity, will no longer be able to represent Ms. Williams.
- 2. The undersigned was appointed as counsel for Ms. Williams under the Criminal Justice Act. The undersigned filed his notice of appearance on January 26, 2006.
- 3. On February 8, 2006, the Court accepted Ms. Williams' guilty plea to one of two counts of the indictment. The plea was pursuant to a Rule 11(c)(1)(C) written plea agreement with the United States. Ms. Williams was then adjudicated guilty of violating 18 U.S.C. § 641 [theft of government property].
 - 4. Ms. Williams is scheduled to be sentenced on June 29, 2006.
- 5. Ms. Williams, accompanied by counsel, met with a representative of the U. S. Probation Office on March 1. At this date, counsel has not received the pre-sentence report. Objections, if any, to the report are due by May 9. Due to the nature of the case and Ms. Williams' history (actually,

lack of history), counsel doubts that there will be objections to the pre-sentence report or that the recommended sentence will differ from that expressed in the plea agreement.

- 6. At all times during counsel's representation, Ms. Williams has been responsive and cooperative.
- 7. Given the status of this case, the undersigned does not believe that a substitution of counsel will prejudice Ms. Williams or delay completion of the case. The undersigned has advised the Federal Defenders of this situation and expects substitute counsel to be arranged.

This the 14th day of April, 2006.

J. Fairley McDonald, III (MCD015)

ASB-0384-1067J

SLATEN & O'CONNOR, P.C. 105 Tallapoosa Street Suite 101 Montgomery, Alabama 36104 (334) 396-8882 (334) 396-8880 [facsimile]

fmcdonald@slatenlaw.com

Certificate of Service

I HEREBY CERTIFY that, on this the 14th day of April, 2006, I electronically filed this Notice with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

> Andrew O. Schiff, Esq. Assistant United States Attorney One Court Square, Suite 201 Montgomery, Alabama 36104

I further certify that I this date served a copy of this Motion on the following by first class United States mail, postage prepaid and properly addressed:

> Ms. Angela Michelle Williams 6116 Oakleigh Road Montgomery, Alabama 36116